



**KATHLEEN McCaffrey Baynes, ESQ., PLLC**

21 Everett Road Extension, Suite A-4

Albany, New York 12205

(518) 489-1098 x14 • (518) 489-3304 (fax)

kmb@kmbaynes.com • www.kmbaynes.com

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May 15, 2018

**Via CM/ECF**

Honorable Andrew T. Baxter  
United States Magistrate Judge  
Northern District of New York  
Federal Building and U.S. Courthouse  
P.O. Box 7396  
Syracuse, NY 13261-7396

RE: New York State Rifle & Pistol  
Ass'n, Inc. v. Beach, No. 18-cv-  
134-BKS-ATB (N.D.N.Y)

Dear Judge Baxter:

The Plaintiffs respectfully seek the Court's leave to amend their Complaint. contemporaneous with this letter, Plaintiffs have filed a motion for leave to amend, a memorandum of law and affidavit supporting the motion, an unsigned copy of the proposed amended complaint, and a "redline" showing the specific changes Plaintiffs propose to make. As noted in the motion and supporting affidavit, Defendants do not oppose Plaintiffs' request to amend the Complaint. In these circumstances, Plaintiffs do not feel the pre-motion conference ordinarily required by Local Rule 7.1(b)(2) would be useful or productive. Accordingly, we respectfully request that the motion for leave be considered and granted without a pre-motion conference.

Sincerely,  
s/ Kathleen McCaffrey Baynes  
Bar Roll No. 507154  
KATHLEEN MCCAFFREY BAYNES,  
ESQ., PLLC  
Attorney of Record  
21 Everett Road Extension, Suite A-4  
Albany, NY 12205  
(518) 489-1098  
[kmb@kmbaynes.com](mailto:kmb@kmbaynes.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on May 15, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and I hereby certify that service will be accomplished by the CM/ECF system on all parties or their counsel.

Dated: May 15, 2018

s/ Kathleen McCaffrey Baynes  
Kathleen McCaffrey Baynes  
Attorney for Plaintiffs

**EFFECTIVE JUNE 1, 2018, THE MAILING AND PHYSICAL ADDRESS OF THE FIRM WILL CHANGE TO 1826 WESTERN AVENUE, ALBANY, NEW YORK 12203. ACCORDINGLY, PLEASE DIRECT ANY MAIL POSTED ON OR AFTER MAY 25, 2018 TO THAT ADDRESS. THANK YOU.**